

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

D.L.; K.S.F.; and K.B., by and through her
parent and next friend H.B.,

Plaintiffs,

v

MICHIGAN DEPARTMENT OF
EDUCATION,

Defendant.

Erin H. Diaz (P80388)
Mitchell D. Sickon (P82407)
Disability Rights Michigan
Attorneys for Plaintiffs
4095 Legacy Parkway
Lansing, Michigan 48911
(517) 487-1755
ediaz@drmich.org
msickon@drmich.org

Jennifer B. Salvatore (P66640)
David L. Fegley (P85275)
Salvatore Prescott Porter & Porter
Attorneys for Plaintiffs
105 E. Main Street
Northville, Michigan 48167
(248) 679-8711
salvatore@sppplaw.com
fegley@sppplaw.com

Elizabeth K. Abdnour (P78203)
ABDNOUR WEIKER LLP
Attorney for Plaintiffs
500 E. Michigan Ave., Ste. 130
Lansing, MI 48912
(517) 994-1776
liz@education-rights.com

Case No. 22-cv-00838-RJJ PJG

Hon. ROBERT J. JONKER

MAG. PHILLIP J. GREEN

Jacquelyn N. Kmetz (P83575)
MI AECRES
Attorney for Plaintiffs
P.O. Box 705
Ludington, Michigan 49431
(231) 794-2379
jkmetz@miaecres.org

Ticara D. Hendley (P81166)
Kathleen A. Halloran (P76453)
Neil Giovanatti (P82305)
Attorneys for Defendant
Michigan Department of
of Attorney General
Health, Education & Family
Services Division
P.O. Box 30758
Lansing, MI 48909
(517) 335-7603
hendleyt1@michigan.gov
giovanattin@michigan.gov
ZackA@michigan.gov

**STIPULATION AND ORDER REGARDING DEFENDANT'S
FORTHCOMING SUMMARY JUDGMENT MOTION**

Given the number of materials disclosed during discovery and that there are three plaintiffs each with distinct factual circumstances, the parties stipulate to extend the word limits and number of pages of exhibits and attachment as set forth below, and further stipulate to the below briefing schedule:

1. Defendant's brief in support of its dispositive motion and Plaintiffs' opposition brief shall each not exceed fifteen thousand (15,000) words.
2. The number of pages of exhibits and attachments relied upon in support of Defendant's brief in support of its dispositive motion and Plaintiffs' opposition brief shall each not exceed six hundred (600) pages. The parties agree to work cooperatively to ensure that exhibits are not duplicated in their respective submissions.
3. The following briefing schedule shall govern Defendant's motion for summary judgment:
 - Defendant's motion and brief due February 7, 2025;
 - Plaintiffs' opposition brief due April 8, 2025; and
 - Defendant's reply brief due April 29, 2025.

IT IS SO ORDERED.

Dated: January __, 2025

HON. ROBERT J. JONKER
United States District Court Judge

Respectfully submitted,

/s/ Mitchell D. Sickon (with consent)

Erin H. Diaz (P80388)
Mitchell D. Sickon (P82407)
Disability Rights Michigan
Attorneys for Plaintiffs
4095 Legacy Parkway
Lansing, Michigan 48911
(517) 487-1755
ediaz@drmich.org
msickon@drmich.org

Jennifer B. Salvatore (P66640)
David L. Fegley (P85275)
Salvatore Prescott Porter & Porter
Attorneys for Plaintiffs
105 E. Main Street
Northville, Michigan 48167
(248) 679-8711
salvatore@sppplaw.com
fegley@sppplaw.com

Elizabeth K. Abdnour (P78203)
ABDNOUR WEIKER LLP
Attorney for Plaintiffs
500 E. Michigan Ave., Ste. 130
Lansing, MI 48912
(517) 994-1776
liz@education-rights.com

Jacquelyn N. Kmetz (P83575)
MI AECRES
Attorney for Plaintiffs
P.O. Box 705
Ludington, Michigan 49431
(231) 794-2379
jkmetz@miaecres.org

/s/ Ticara D. Hendley

Ticara D. Hendley (P81166)
Kathleen A. Halloran (P76453)
Neil Giovanatti (P82305)
Amanda E. Zack (P82326)
Attorneys for Defendant
Michigan Department of
Attorney General
Health, Education & Family
Services Division
P.O. Box 30758
Lansing, MI 48909
(517) 335-7603
hendleyt1@michigan.gov
hallorank1@michigan.gov
giovanattin@michigan.gov